

**UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re) Chapter 11
)
DELPHI CORPORATION, <i>et al.</i> ,) Case No. 05-44481 (RDD)
)
Debtors.) (Jointly Administered)
)
)

**NOTICE OF APPEARANCE AND
DEMAND FOR NOTICES AND PAPERS**

Pursuant to Rules 2002 and 9010(b) of the Federal Rules of Bankruptcy Procedure and section 1109(b) of title 11 of the United States Code, the following counsel enter their appearance on behalf of Martinrea International Inc. ("Martinrea") and request that all notices given or required to be given, and all papers served in these cases, be delivered to and served upon the following at their offices at the address set forth below, and that the following be added to the general matrix and all special or limited matrices in these matters.

All motions, pleadings, notices, applications and other papers should be served upon:

George B. South III, Esq.
Alexandra B. Feldman, Esq.
King & Spalding LLP
1185 Avenue of the Americas
New York, New York 10036
Tel. No. 212-556-2100
Fax No. 212-556-2222

PLEASE TAKE FURTHER NOTICE that the foregoing request includes not only the notices and papers referred to in the Rules specified above but also includes, without limitation, notices of any application, complaint, demand, hearing, motion, order, petitions, plan of reorganization or disclosure statement, pleading or request, whether formal or informal,

written or oral, and whether transmitted or conveyed by mail, hand delivery, telephone, telegraph, telex or telefax or otherwise, filed with regard to the above case and proceedings therein.

PLEASE TAKE FURTHER NOTICE that neither this notice of appearance, pleading, claim, or suit shall waive any right of Martinrea, or any related entity: (1) to have final orders in non-core matters entered only after *de novo* review by a District Judge, (2) to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case, or (3) to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal.

PLEASE TAKE FURTHER NOTICE that this Notice of Appearance and Demand for Notices and Papers is without prejudice to: (1) any and all rights, remedies, claims, actions, defenses, setoffs, or recoupments, in law or in equity, of Martinrea, or any entity related thereto, against the Debtor and any other entities either in this case or in any other action, all of which rights, remedies, claims, actions, defenses, setoffs and recoupments are expressly reserved, and (2) any objection which may be made to the jurisdiction of the Court, and shall not

be deemed or construed to submit Martinrea, or any entity related thereto, to the jurisdiction of the Court.

Dated: October 28, 2005
New York, New York

KING & SPALDING LLP

By: /s/ George B. South III
George B. South III (GS 3904)
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